

# Flachsbart & Greenspoon, LLC

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June 24, 2013

**Via ECF**

The Honorable David S. Doty  
United States District Court  
United States Courthouse, Suite 14W  
300 South Fourth Street  
Minneapolis, MN 55415

**Re: R.J. Zayed v. Associated Bank, N.A., 13-CV-232 (DSD/JSM)**

Dear Judge Doty:

We write in brief response to the letter received from Faegre Baker Daniels this afternoon regarding an identification of new authority by Mr. Webber. We were not advised that anyone from Faegre would be contacting the Court.

We have reviewed the case of *Picard v. JPMorgan Chase & Co.*, and differ strongly on the applicability of *Picard* (a bankruptcy case) to this matter about a receiver. While we understand that the Court does not want analysis by letter, if the Court is inclined to think otherwise we respectfully request the opportunity to brief the issue.

As a side matter, we respectfully request an admonition about future *ex parte* contact by counsel for the defense.

Sincerely,



Robert P. Greenspoon